

EXHIBIT 6

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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA

12 SAN FRANCISCO DIVISION

13 WAYMO LLC

14 Plaintiffs,

15 v.

16 UBER TECHNOLOGIES, INC.;
17 OTTOMOTTO, LLC; OTTO TRUCKING
18 LLC,

19 Defendants.

Case No. 17-cv-00939-JCS

**PLAINTIFF'S RESPONSES AND
OBJECTIONS TO OTTO TRUCKING'S
FOURTH SET OF REQUESTS FOR
PRODUCTIONS (NOS. 71-83)**

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

1 Levandowski was part of any organization groups or security permission groups that shared access
2 to certain accounts or repositories.

3
4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 81:**

5 Waymo objects to this request as irrelevant, overbroad, and not proportional to the needs
6 of the case.

7 Waymo has produced all relevant communications between Anthony Levandowski and
8 network administrators as located through a reasonably diligent search, including communications
9 through which Waymo issued passwords to Anthony Levandowski used to access the SVN server.

10
11 **REQUEST FOR PRODUCTION NO. 82:**

12 All Communications between Sasha Zbrozek and Anthony Levandowski.

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14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 82:**

15 Waymo objects to this request as irrelevant, overbroad, and not proportional to the needs
16 of the case.

17 Waymo has produced all communications between Sasha Zbrozek and Anthony
18 Levandowski, including but not limited to communications concerning LiDAR or the SVN server,
19 as located through a reasonably diligent search.

20
21 **REQUEST FOR PRODUCTION NO. 83:**

22 All policies or notices that specifically govern the use of the SVN server, including any
23 policies or notices that set limits on use of the SVN server or downloads from the SVN server or
24 define unauthorized use of the SVN server.

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26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 83:**

27 Waymo has produced all policies that specifically govern the use of the SVN server.

HIGHLY CONFIDENTIAL – ATTORNEYS’ EYES ONLY

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DATED: August 24, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

By /s/ Charles K. Verhoeven

Charles K. Verhoeven
Attorneys for WAYMO LLC